

Exhibit 1

From: [do Amaral, Paulina](#)
To: [Robert M. Barnes](#)
Cc: [EXT Track1BDefendants](#); [Peter H. Weinberger \(pweinberger@spanglaw.com\)](#); [Michelle Carreras](#)
Subject: RE: Opioids - MIL Stipulations
Date: Thursday, August 13, 2020 1:41:52 PM

Bob,

Regarding #11, Plaintiffs understand that the Court granted a similar (but narrower) MIL in the CT1A trial, and we are noting our objection to that ruling in our MILs, based on the arguments set forth in our prior MIL briefing.

Regarding #2, Plaintiffs do not believe that this stipulation is necessary in this trial. We understand you may wish to proceed with this MIL.

Thanks.

Paulina

From: Robert M. Barnes [mailto:rbarnes@marcus-shapira.com]
Sent: Thursday, August 13, 2020 12:30 PM
To: do Amaral, Paulina
Cc: EXT Track1BDefendants; Peter H. Weinberger (pweinberger@spanglaw.com); Michelle Carreras
Subject: RE: Opioids - MIL Stipulations

Paulina: What is the basis for deleting of #2 (military service or prior employment or religious affiliation or personal experience of parties' counsel) and #11 (corporate representative's presence/absence at trial or identity)? Ps previously agreed to #2 in 1A (Doc #2647). And the Court granted Ds' MIL #14 re no commenting on absence of corporate representative at trial (Doc #3058) citing caselaw that says "the presence, absence or identity of defendant's corporate representative is wholly irrelevant to plaintiffs' claims. We would prefer to avoid unnecessary MILs on these points.

From: do Amaral, Paulina <Pdoamaral@lchb.com>
Sent: Thursday, August 13, 2020 7:05 AM
To: Robert M. Barnes <rbarnes@marcus-shapira.com>
Cc: EXT Track1BDefendants <EXT_Track1BDefendants@jonesday.com>; Peter H. Weinberger (pweinberger@spanglaw.com) <pweinberger@spanglaw.com>; Michelle Carreras <Michelle.Carreras@LanierLawFirm.com>
Subject: RE: Opioids - MIL Stipulations

Good morning Bob,

Please see our edits attached.

Paulina



Paulina do Amaral

Partner

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From: Robert M. Barnes [<mailto:rbarnes@marcus-shapira.com>]

Sent: Tuesday, August 11, 2020 7:31 PM

To: do Amaral, Paulina

Cc: EXT Track1BDefendants

Subject: RE: Opioids - MIL Stipulations

Paulina: Attached is a draft of our still-in-progress In Limine Evidentiary Stipulations. We may have a few additional items.

From: Robert M. Barnes

Sent: Friday, August 7, 2020 7:57 PM

To: 'do Amaral, Paulina' <Pdoamaral@lchb.com>

Subject: RE: Opioids - MIL Stipulations

Paulina: Yes, with some needed modifications (take out references to treble and punitive damages) and some other modifications that I will get to you on Monday.

From: do Amaral, Paulina <Pdoamaral@lchb.com>

Sent: Friday, August 7, 2020 1:58 PM

To: Robert M. Barnes <rbarnes@marcus-shapira.com>

Subject: RE: Opioids - MIL Stipulations

Dear Bob,

Please see attached the *In Limine* Evidentiary Stipulations the parties entered into prior to the CT1A trial. Are the CT1B defendants willing to enter into the same stipulations?

Paulina

Paulina do Amaral

Partner



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